

## Exhibit K

**Gangnes, Larry**

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**From:** Papelian, Joseph E <joseph.e.papelian@delphi.com>  
**Sent:** Monday, September 28, 2015 10:30 AM  
**To:** oochoa@susmangodfrey.com  
**Cc:** vicky@cuneolaw.com; blondon@fkmlaw.com; DLambrinos@cpmlegal.com; swilliams@cpmlegal.com; Gangnes, Larry; Frantangelo, Barbara K; Yeager, Judy  
**Subject:** Wire Harness Auto Parts - Follow-up To 09/28/15 Call (Response to Discovery Requests)

Omar:

This follows our call this afternoon regarding the Wire Harness Discovery Requests. In addition to you, Larry Gangnes was also on the call. On the call from Delphi were Barbara Frantangelo, David Foren, Paul Falet, Shishir Gupta, and me.

Item # 1: Sourcing Files - DPRG Packages

- \* Pre-2011: As we discussed, we conducted a search of the documents collected in response to the DOJ subpoena. There are approximately 28,000 documents responsive to the terms "DPRG" and/or "Divisional Pricing Review Group," which will need to be reviewed by contract attorneys for privilege and responsiveness.
- \* Post-2011: We anticipate 3-4 weeks to search for DPRG presentations post-2011. Although the actual search should only take 2 days, we would need a month to ensure the Delphi representative can conduct the search along with his normal work responsibilities.

Item # 2: Transactional Data

- \* Pre-2006: This information is stored on a database maintained by General Motors. Although our IT group advised there is a low probability the data still exists, Delphi agreed to reach out to GM and make the inquiry for responsive data.
- \* Post-2006: The SAP database Delphi has access to is limited to the United States (with perhaps some information from Mexico), since each country maintains its own SAP database. It was discussed that downloading the data to Excel is difficult. We discussed the possibility of a third party access to the SAP database. Any third party would have to be approved by Delphi and agree to specific confidentiality / confidential provisions to protect Delphi's data. Please let me know if you are interested in discussing this further. Delphi agreed to attempt to provide definitions for the categories of documents within the database.

Item # 3: Miscellaneous

- \* It was agreed Delphi would create a list identifying the custodians of the documents produced to the DOJ in the wire harness matter.
- \* Delphi will attempt to provide the costs incurred for producing documents to the DOJ.

By copy of this email to Judy Yeager I'm asking she scheduled a follow-up call We will schedule a follow up call on October 12 around noon.

Please call if you have any questions.

Joe  
248 813-2535

\*\*\*\*\*  
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## Exhibit L

**Gangnes, Larry**

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**From:** Gangnes, Larry  
**Sent:** Wednesday, October 28, 2015 9:51 AM  
**To:** Papelian, Joseph E  
**Cc:** Omar Ochoa; Vicky Romanenko; 'blondon@fkmlaw.com' (blondon@fkmlaw.com); Demetrius Lambrinos; Steve Williams; Frantangelo, Barbara K; Yeager, Judy  
**Subject:** Wire Harness Auto Parts - Follow-up To 09/28/15 Call (Delphi Response to Discovery Requests)  
**Attachments:** Auto Parts - Discovery Follow up Letter to Delphi.pdf; KE30 Example.xlsx

Joe,

Thank you again for hosting the parties' calls with you and your colleagues at Delphi on Sept. 28 and Oct. 12. We are following up on your email below and the discussion on Oct. 12 with respect to Delphi's production of its transactional data and its SAP data base.

First, we would like to understand why it is easier for Delphi to produce monthly data spreadsheets (like the attached sample KE30 report you sent us with your July 30 email) than the raw transactional data in the SAP data base. In other words, is there any difference in the cost and effort required to produce the monthly spreadsheets from the data base than that required to produce the raw data from the data base, and if so, what is the difference?

Second, we would like to understand what transactional data is available in Delphi's SAP data base that is not available in the monthly spreadsheets. In this regard, please let us know which of the categories of information listed in Omar's June 1, 2015 letter (attached, at pp. 2-4) are found (or alternatively, not found) in the SAP data base.

Third, we would like to know what the cost is to Delphi in extracting the data from the SAP data base and whether there is any cost to Delphi in producing the data in electronic form other than the cost of extraction.

Fourth, please provide us with the categories of documents in the SAP data base per your email below.

Fifth, during our Oct. 12 call, you agreed to consult with your colleagues as to whether Delphi would permit a third-party vendor to look at its SAP data base for purposes of estimating what it would cost for that vendor to extract the data.

Finally, please let us know whether Delphi has received definitive word from GM as to whether GM has any of Delphi's pre-2006 data.

Thank you for your continuing cooperation and assistance.

Regards. Larry

**Larry Gangnes | Lane Powell PC**  
Shareholder | [Bio](#) | [vCard](#)  
1420 Fifth Avenue, Suite 4200  
P.O. Box 91302 | Seattle, WA 98111-9402

Direct: 206.223.7036 | Mobile: 206.779.6745  
GangnesL@LanePowell.com | www.lanepowell.com

-----Original Message-----

From: Papelian, Joseph E [mailto:joseph.e.papelian@delphi.com]

Sent: Monday, September 28, 2015 10:30 AM

To: Omar Ochoa

Cc: Vicky Romanenko; 'blondon@fkmlaw.com' (blondon@fkmlaw.com); Demetrius Lambrinos; Steve Williams; Gangnes, Larry; Frantangelo, Barbara K; Yeager, Judy

Subject: Wire Harness Auto Parts - Follow-up To 09/28/15 Call (Response to Discovery Requests)

Omar:

This follows our call this afternoon regarding the Wire Harness Discovery Requests. In addition to you, Larry Gangnes was also on the call. On the call from Delphi were Barbara Frantangelo, David Foren, Paul Falet, Shishir Gupta, and me.

#### Item # 1: Sourcing Files - DPRG Packages

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- \* Post-2011: We anticipate 3-4 weeks to search for DPRG presentations post-2011. Although the actual search should only take 2 days, we would need a month to ensure the Delphi representative can conduct the search along with his normal work responsibilities.

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#### Item # 3: Miscellaneous

- \* It was agreed Delphi would create a list identifying the custodians of the documents produced to the DOJ in the wire harness matter.
- \* Delphi will attempt to provide the costs incurred for producing documents to the DOJ.

By copy of this email to Judy Yeager I'm asking she scheduled a follow-up call We will schedule a follow up call on October 12 around noon.

Please call if you have any questions.

Joe  
248 813-2535

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**Gangnes, Larry**

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**From:** Papelian, Joseph E <joseph.e.papelian@delphi.com>  
**Sent:** Friday, December 04, 2015 8:15 AM  
**To:** Gangnes, Larry  
**Cc:** Frantangelo, Barbara K  
**Subject:** Response to Gangnes re: Wire Harness  
**Attachments:** KE30 vs SAP.XLSX

Larry:

I'm sending this email before our call later this morning responding to your October 28, 2015 email. I have listed your questions below, and noted our responses:

1. First, we would like to understand why it is easier for Delphi to produce monthly data spreadsheets (like the sample KE30 report you sent us with your July 30 email) than the raw transactional data in the SAP data base. In other words, is there any difference in the cost and effort required to produce the monthly spreadsheets from the data base than that required to produce the raw data from the data base, and if so, what is the difference?

**The spreadsheets for KE30 that were sent have lookup tables that contain mapping that is not available in SAP to group the data by PBU, CBU, and Platforms. The raw data would not have this mapping and make it difficult to understand or group the data.**

2. Second, we would like to understand what transactional data is available in Delphi's SAP data base that is not available in the monthly spreadsheets. In this regard, please let us know which of the categories of information listed in Omar's June 1, 2015 letter (attached, at pp. 2-4) are found (or alternatively, not found) in the SAP data base.

**Please see attached.**

3. Third, we would like to know what the cost is to Delphi in extracting the data from the SAP data base and whether there is any cost to Delphi in producing the data in electronic form other than the cost of extraction.

**In order to respond to this request, we would have to engage a third party to obtain a quote. We have not yet done so.**

4. Fourth, please provide us with the categories of documents in the SAP data base per your email below.

**See attached**

5. Fifth, during our Oct. 12 call, you agreed to consult with your colleagues as to whether Delphi would permit a third-party vendor to look at its SAP data base for purposes of estimating what it would cost for that vendor to extract the data.

**In order to respond to this request, we would have to engage a third party to obtain a quote. We have not yet done so.**

6. Finally, please let us know whether Delphi has received definitive word from GM as to whether GM has any of Delphi's pre-2006 data.



**We received a response from GM that they no longer have the data.**

Thanks,

Joe

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## Exhibit M

**Gangnes, Larry**

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**From:** Gangnes, Larry  
**Sent:** Monday, December 14, 2015 7:25 PM  
**To:** Papelian, Joseph E  
**Cc:** Davis, Kenneth R.; barbara.k.frantangelo@delphi.com; Fine, Stephanie  
**Subject:** Wire Harness Defendants' Discovery Requests to Delphi  
**Attachments:** Wire Harness Auto Parts - Response to Discovery Requests; Wire Harness Auto Parts - Follow-up To 09/28/15 Call (Response to Discovery Requests); Response to Gangnes re: Wire Harness

Joe,

Thanks for speaking with me and Stephanie Fine this morning. Our proposal for moving forward with the Wire Harness Defendants' discovery requests to Delphi is summarized below, as you requested.

As discussed, we would like to proceed in two stages. First, we would like to get an estimate of the costs to retain a third-party vendor to extract Delphi's transactional data regarding its purchases of Wire Harness Products ("WHPs") (as defined in plaintiffs' consolidated complaints) from its suppliers and sales of such Products to all OEM and other customers for whatever time periods Delphi maintains such data, as described in your July 30, September 28, and December 4 emails (attached). This production would include the monthly KE30 summary sales reports, a sample of which was attached to your July 30 email. Please let us know the time periods for which Delphi has the KE30 sales reports, including prior to 2006. You also agreed to see whether Delphi has a monthly summary of its purchases of WHPs. Finally, please explain the note in the spreadsheet attached to your December 4 email to the effect that: "SAP data for DEEDS did not start until 2008 and was not completed until Nov 2009 – will have partial data until that time."

As I mentioned, we have located a vendor familiar with SAP databases that is available to extract Delphi's transactional data – Zencos Consulting ([www.zencos.com](http://www.zencos.com)) in Cary, North Carolina. We have spoken with Ben Zenick, Zencos' co-founder and COO ([bzenick@zencos.com](mailto:bzenick@zencos.com); 919-459-4600 x 103; mobile: 919-524-4524), about obtaining a cost estimate for this project. To that end, Mr. Zenick will be contacting you for information about the scope of work. Once we have a cost estimate from Zencos, Defendants will be in a position then to decide whether and how best to proceed with production of the data.

The second discovery stage concerns the production of Delphi's electronic and other documents. In this regard, we request that Delphi produce the categories of documents described in your July 30 email (attached). In addition, we understand from our May 23, 2014 telephone conference with you and some of your Delphi colleagues that Delphi can print invoices from a database or produce the database. You agreed to find out for us the time periods for which Delphi has invoices for its sales of WHPs. Finally, we would request that Delphi produce any documents it has concerning purchases of WHPs from, or sales of WHPs to, the following Direct Purchaser Plaintiffs (or successors):

1. Mexican Industries in Michigan, Inc., a now bankrupt Michigan corporation with its principal place of business in Detroit, Michigan;
2. Paesano Connecting Systems, Inc., a Pennsylvania corporation with its principal place of business in Ridgway, Pennsylvania;

3. Craft-Co Enterprises, Inc., a Mississippi corporation with its principal place of business in Brandon, Mississippi;
4. Findlay Industries, Inc., an Ohio corporation with its principal place of business in Findlay, Ohio;
5. Cesar-Scott, Inc., a Texas corporation with its principal place of business in El Paso, Texas;
6. Martinez Manufacturing, Inc. ("Martinez"), an Illinois corporation with its principal place of business in Cary, Illinois;
7. Thermtrol Corporation, the successor to Martinez, an Ohio corporation with its principal place of business in North Canton, Ohio;
8. South Star Corporation, a Virginia corporation with its principal place of business in Elliston, Virginia; and
9. ACAP, L.L.C., f/k/a Aguirre, Collins & Aikman Plastics, LLC, a defunct Michigan limited liability company formerly with its principal place of business in Michigan.

We understand that Delphi proposes to hire contract document reviewers to review Delphi's production to remove any privileged documents. We also understand from your September 28 email that Delphi has already conducted a search for its DPRG packages for the period prior to 2011 and located about 28,000 responsive documents for such a review.

Again, we would like to see if we and Delphi can come up with a more definitive estimate of the costs of reviewing and producing such documents before Defendants decide to proceed and commit to paying such costs. We are hopeful that the costs will not approach the \$100,000 you estimated earlier.

To that end, we believe that the costs Delphi incurs in reviewing the 2,700 documents (7,500 pages) it has located regarding Ford's CD4 RFQ will be informative. One of the Defendants has already asked Delphi to proceed with that production. Once we know the costs of reviewing and producing the CD4 documents, Defendants and Delphi will be in a better position to estimate the costs of reviewing and producing the other documents described above, and Defendants will be able to decide whether and how best to proceed with production of those documents.

Finally, we should mention a few more caveats. First, our experience with WHP databases has been that there are always follow-up questions about the data and data fields produced. We would like to be able to pose such questions to Delphi informally and get answers. Second, Defendants would like to obtain a declaration from the appropriate person(s) at Delphi confirming that the data and documents produced are business records within the meaning of FRE 803(6). Third, you agreed in your September 28 email to provide us with a list identifying the custodians of the documents produced to the DOJ (which documents have been produced to both Plaintiffs and Defendants). Please provide us with this list identifying the custodians and the Bates number ranges of the documents produced from their files. Fourth, based on review of the DPRG packages produced, Defendants would like to reserve their rights to make further narrow, targeted requests for additional documents, if necessary, such as documents relating to a specific RFQ.

We will also be sending this email to Plaintiffs' counsel in an effort to see whether they wish to participate and whether they have any additional requests.

Thank you again for your attention to this matter. We look forward to hearing from you and moving forward.

Regards. Larry

**Larry Gangnes | Lane Powell PC**

**Shareholder** | [Bio](#) | [vCard](#)

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## Exhibit N

**Gangnes, Larry**

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**From:** Gangnes, Larry  
**Sent:** Sunday, January 24, 2016 8:50 PM  
**To:** 'Papelian, Joseph E'  
**Cc:** blondon@fklmlaw.com; evelyn@cuneolaw.com; 'Omar Ochoa'; Davis, Kenneth R.; Frantangelo, Barbara K; Yeager, Judy  
**Subject:** Discovery Requests to Delphi

Joe,

Thank you for your email and for speaking with us on Friday. Please see my clarifying comments in italics in your email below. Please note also that we are still seeking the other categories of documents mentioned in your July 30, 2015 email, including Delphi's 5-year revenue plans for whatever period such plans exist up to December 31, 2014.

As requested, please be advised that the lead spokesperson for the OEMs has been Colin Kass. His contact info is:

PROSKAUER ROSE LLP  
1001 Pennsylvania Avenue, N.W.  
Suite 600 South  
Washington, DC 20004-2533  
202.416.6890  
[ckass@proskauer.com](mailto:ckass@proskauer.com)

Finally, later this week I will provide dates and times for our follow-up call during the week of Feb. 1.

Regards.

**Larry Gangnes | Lane Powell PC**

**Shareholder** | [Bio](#) | [vCard](#)  
1420 Fifth Avenue, Suite 4200  
P.O. Box 91302 | Seattle, WA 98111-9402  
Direct: 206.223.7036 | Mobile: 206.779.6745  
[GangnesL@LanePowell.com](mailto:GangnesL@LanePowell.com) | [www.lanepowell.com](http://www.lanepowell.com)

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**From:** Papelian, Joseph E [<mailto:joseph.e.papelian@delphi.com>]  
**Sent:** Friday, January 22, 2016 12:35 PM  
**To:** Gangnes, Larry; blondon@fklmlaw.com; evelyn@cuneolaw.com  
**Cc:** Frantangelo, Barbara K; Yeager, Judy  
**Subject:** Antitrust Wire Harness - Discovery Requests

Larry, Billy and Evelyn:

This email follows the conference call this afternoon attended by: Larry Gangnes (counsel for Furukawa), Billy London (counsel for Direct Purchasers) and Evelyn Li (counsel for Auto Dealers); and Barb Frantangelo and me on behalf of Delphi Automotive Systems, LLC (Delphi). This was one of several calls we have had over the

last several months pertaining to documents you have requested from Delphi in the pending Wire Harness antitrust case before Judge Battani (Case No. 12-md-02311). As you know, Delphi is **not** a party, and failing an agreement you will need to issue a third party subpoena if you want discovery from Delphi.

Here are the action items we noted from our call today: Please note this information relates to Wire Harness documents / data in North America only.

1. Delphi to advise whether they have received approval from Finance to allow a 3<sup>rd</sup> party vendor to review and download 2006 – 2014 SAP data. – *meaning transactional data for all purchases and sales of Wire Harness Products (as defined in plaintiffs' complaints) for whatever period such data exists up to December 31, 2014.*
2. Delphi to determine the timing and cost to review and produce the 2006 – 2014 SAP data in-house. – *same as above.*
3. Delphi to determine the timing and cost to search for, review and produce KE30 sales summaries and, if they exist, similar purchase summaries, for 2006 – 2014. -- *meaning monthly KE30 summaries of all sales of Wire Harness Products for whatever period such summaries exist or can be generated up to December 31, 2014, and similar summaries of monthly purchases of Wire Harness Products, if they exist or can be generated.*
4. Delphi to determine the timing and cost to search for, review, and produce DPRG packages from 2010 – 2014. – *meaning DPRG packages pertaining to (a) all RFQ responses or bids for the sale of Wire Harness Products or (b) other sales of Wire Harness Products, including sales made on a sole sourcing basis. In our January 19 call, you said that Delphi would conduct this search at no cost to the parties. We understand from your Oct. 28, 2015 email to Omar Ochoa that Delphi has already conducted a search for such DPRG packages for the period prior to 2011 and located 28,000 documents.*
5. Delphi to determine the period of time for which it has relevant invoices, as well as the timing and cost to search for, review, and produce such documents. I mentioned we have a sample invoice that we will provide to you if an overall agreement is reached. – *meaning invoices for all sales of Wire Harness Products for whatever period they exist up to December 31, 2014.*
6. Delphi to respond regarding purchases or sales of Wire Harness[es] Products to the nine (9) companies identified in Larry Gangnes' 12/14/15 email.
7. Delphi to advise whether it is willing to provide declarations from the business people as to the authenticity of its documents as business records.
8. Delphi to advise whether it is willing to provide a list of custodians for the documents it produced to the DOJ. *Please note that you agreed to provide such a list in your Oct. 28 email.*
9. Larry Gangnes to provide Delphi the contact information for Colin Kass, counsel for GM in the Wire Harness matter. *See email above.*
10. Larry Gangnes to provide available dates for a follow-up call the week of February 1, 2016, understanding we are not available the morning of February 5, 2016. Please coordinate the date with Judy Yeager, who is copied on this email.

Thank you,

Joe Papelian  
248 813-2535



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